

# EXHIBIT 22

JJK/dat (10355)  
STATE OF ILLINOIS )  
 )SS.  
COUNTY OF COOK )

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CIRCUIT COURT OF COOK  
COUNTY, ILLINOIS  
LAW DIVISION  
DOROTHY BRIDGEMAN  
CLERK

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION

RAUL REGALADO,	)	03L 013226
	)	CALENDAR E
Plaintiff,	)	P.I. STRUCTURAL
	)	
vs.	)	No.
	)	
F.H. PASCHEN, S.N. NIELSEN, INC.,	)	Plaintiff demands trial by jury.
JACOBS FACILITIES, INC.,	)	
VOA & ASSOCIATES, and CONSOLIDATED	)	
HIGH SCHOOL DISTRICT 230,	)	
	)	
Defendants.	)	

COMPLAINT AT LAW

COUNT I - F.H. PASCHEN, S.N. NIELSEN, INC.

NOW COMES the Plaintiff, RAUL REGALADO, by and through his attorneys, CLIFFORD LAW OFFICES, P.C., complaining of the Defendant, F.H. PASCHEN, S.N. NIELSEN, INC., (hereinafter referred to as "PASCHEN"), states as follows:

1. On June 7, 2002, Defendant, PASCHEN, through its various agents, employees and servants, were in charge of the construction, renovation and building of a structure located at Amos Alonzo Stagg High School, 8015 West 111<sup>th</sup> Street, in the City of Palos Hills, County of Cook and State of Illinois.
2. On and before June 7, 2002, Defendant, PASCHEN, through its various agents, employees and servants, performed construction work, including but not limited to, the planning and installation of the Performing Arts Theater at Stagg High School.

3. On and before June 7, 2002, the Plaintiff, RAUL REGALADO, was an employee of Cliffs & Cables, a subcontractor on the project, and was engaged in the performance of his duties at or near a portion of the structure, commonly called the Performing Arts Theater.

4. On and before June 7, 2002, while Defendant, PASCHEN, was in the process of undertaking and performing construction and installation on the premises at or near the Performing Arts Theater, the Plaintiff, RAUL REGALADO, was injured when he fell into the orchestra pit in the Performing Art Theater.

5. On June 7, 2002, the Defendant, PASCHEN, by and through its duly authorized agents, employees and servants, was negligent in one or more of the following respects:

- a. Failed to give adequate warnings regarding the orchestra pit;
- b. Failed to adequately cover, secure or barricade the orchestra pit when they knew individuals were working and/or walking in that area;
- c. Failed to provide a railing, yellow tape or other adequate devices to prevent the Plaintiff from falling through this opening;
- d. Failed to provide the Plaintiff with a safe work area;
- e. Failed to adequately light the area when they knew or should have known that individuals would be working or walking in the area of the orchestra pit;
- f. Failed to make a reasonable inspection of the premises and the work being done.

6. As a direct and proximate result of one or more of the aforesaid acts or omissions of the Defendant, PASCHEN, the Plaintiff, RAUL REGALADO, sustained injuries of personal and pecuniary nature.

WHEREFORE, Plaintiff, RAUL REGALADO, demands judgment against the Defendant, F.H. PASCHEN, S.N. NIELSEN, INC., for a sum in excess of FIFTY THOUSAND DOLLARS (\$50,000.00).

COUNT II - JACOBS FACILITIES, INC.

NOW COMES the Plaintiff, RAUL REGALADO, by and through his attorneys, CLIFFORD LAW OFFICES, P.C., complaining of the Defendant, JACOBS FACILITIES, INC., states as follows:

1. On June 7, 2002, Defendant, PASCHEN, through its various agents, employees and servants, were in charge of the construction, renovation and building of a structure located at Amos Alonzo Stagg High School, 8015 West 111<sup>th</sup> Street, in the City of Palos Hills, County of Cook and State of Illinois.
2. On and before June 7, 2002, Defendant, PASCHEN, through its various agents, employees and servants, performed construction work, including but not limited to, the planning and installation of the Performing Arts Theater at Stagg High School.
3. On and before June 7, 2002, Defendant, JACOB FACILITIES, INC., served as the project manager and/or construction manager for the work at or near the structure commonly called the Performing Arts Theater.
4. On and before June 7, 2002, the Plaintiff, RAUL REGALADO, was an employee of Cliffs & Cables, a subcontractor on the project, and was engaged in the performance of his duties at or near a portion of the structure commonly called the Performing Arts Theater.
5. On and before June 7, 2002, while Defendant, JACOBS FACILITIES, INC., was in the process of undertaking and performing construction and installation on the premises at or near the Performing Arts Theater, the Plaintiff, RAUL REGALADO, was injured when he fell into the orchestra pit in the Performing Art Theater.

6. On June 7, 2002, the Defendant, JACOBS FACILITIES, INC., by and through its duly authorized agents, employees and servants, was negligent in one or more of the following respects:

- a. Failed to give adequate warnings regarding the orchestra pit;
- b. Failed to adequately cover, secure or barricade the orchestra pit when they knew individuals were working and/or walking in that area;
- c. Failed to provide a railing, yellow tape or other adequate devices to prevent the Plaintiff from falling through this opening;
- d. Failed to provide the Plaintiff with a safe work area;
- e. Failed to adequately light the area when they knew or should have known that individuals would be working or walking in the area of the orchestra pit;
- f. Failed to make a reasonable inspection of the premises and the work being done.

7. As a direct and proximate result of one or more of the aforesaid acts or omissions of the Defendant, JACOBS FACILITIES, INC., the Plaintiff, RAUL REGALADO, sustained injuries of personal and pecuniary nature.

WHEREFORE, Plaintiff, RAUL REGALADO, demands judgment against the Defendant, JACOBS FACILITIES, INC., for a sum in excess of FIFTY THOUSAND DOLLARS (\$50,000.00).

**COUNT III - VOA & ASSOCIATES**

NOW COMES the Plaintiff, RAUL REGALADO, by and through his attorneys, CLIFFORD LAW OFFICES, P.C., complaining of the Defendant, VOA & ASSOCIATES, states as follows:

1. On June 7, 2002, Defendant, PASCHEN, through its various agents, employees and servants, were in charge of the construction, renovation and building of a structure located at Amos Alonzo Stagg High School, 8015 West 111<sup>th</sup> Street, in the City of Palos Hills, County of Cook and State of Illinois.

2. On and before June 7, 2002, Defendant, VOA & ASSOCIATES, through its various agents, employees and servants, served as the architect for the property commonly known as the Performing Arts Theater.

3. On and before June 7, 2002, the Plaintiff, RAUL REGALADO, was an employee of Cliffs & Cables, a subcontractor on the project and was engaged in the performance of his duties at or near a portion of the structure, commonly called the Performing Arts Theater.

4. On and before June 7, 2002, while Defendant, VOA & ASSOCIATES, was in the process of undertaking and performing construction and installation on the premises at or near the Performing Arts Theater, the Plaintiff, RAUL REGALADO, was injured when he fell into the orchestra pit in the Performing Art Theater.

5. On June 7, 2002, the Defendant, VOA & ASSOCIATES, by and through its duly authorized agents, employees and servants, was negligent in one or more of the following respects:

- a. Failed to give adequate warnings regarding the orchestra pit;
- b. Failed to adequately cover, secure or barricade the orchestra pit when they knew individuals were working and/or walking in that area;
- c. Failed to provide a railing, yellow tape or other adequate devices to prevent the Plaintiff from falling through this opening;
- d. Failed to provide the Plaintiff with a safe work area;
- e. Failed to adequately light the area when they knew or should have known that individuals would be working or walking in the area of the orchestra pit;
- f. Failed to make a reasonable inspection of the premises and the work being done.

6. As a direct and proximate result of one or more of the aforesaid acts or omissions of the Defendant, VOA & ASSOCIATES, the Plaintiff, RAUL REGALADO, sustained injuries of personal and pecuniary nature.

WHEREFORE, Plaintiff, RAUL REGALADO, demands judgment against the Defendant, VOA & ASSOCIATES, for a sum in excess of FIFTY THOUSAND DOLLARS (\$50,000.00).

**COUNT IV - CONSOLIDATED HIGH SCHOOL DISTRICT 230**

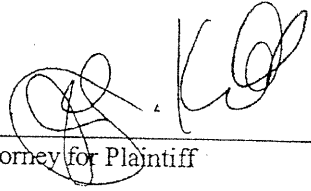
NOW COMES the Plaintiff, RAUL REGALADO, by and through his attorneys, CLIFFORD LAW OFFICES, P.C., complaining of the Defendant, CONSOLIDATED HIGH SCHOOL DISTRICT 230, states as follows:

1. On June 7, 2002, Defendant, PASCHEN, through its various agents, employees and servants, were in charge of the construction, renovation and building of a structure located at Amos Alonzo Stagg High School, 8015 West 111<sup>th</sup> Street, in the City of Palos Hills, County of Cook and State of Illinois.
2. On and before June 7, 2002, Defendant, CONSOLIDATED HIGH SCHOOL DISTRICT 230, owned, operated, managed and maintained the property located at 8015 West 111<sup>th</sup> Street in Palos Hills, Illinois.
3. On and before June 7, 2002, the Plaintiff, RAUL REGALADO, was an employee of Cliffs & Cables, a subcontractor on the project and was engaged in the performance of his duties at or near a portion of the structure, commonly called the Performing Arts Theater.
4. On and before June 7, 2002, while Defendant, CONSOLIDATED HIGH SCHOOL DISTRICT 230, was in the process of undertaking and performing construction and installation on the premises at or near the Performing Arts Theater, the Plaintiff, RAUL REGALADO, was injured when he fell into the orchestra pit in the Performing Art Theater.
5. On June 7, 2002, the Defendant, CONSOLIDATED HIGH SCHOOL DISTRICT 230, by and through its duly authorized agents, employees and servants, was negligent in one or more of the following respects:

- a. Failed to give adequate warnings regarding the orchestra pit;
- b. Failed to adequately cover, secure or barricade the orchestra pit when they knew individuals were working and/or walking in that area;
- c. Failed to provide a railing, yellow tape or other adequate devices to prevent the Plaintiff from falling through this opening;
- d. Failed to provide the Plaintiff with a safe work area;
- e. Failed to adequately light the area when they knew or should have known that individuals would be working or walking in the area of the orchestra pit;
- f. Failed to make a reasonable inspection of the premises and the work being done.

6. As a direct and proximate result of one or more of the aforesaid acts or omissions of the Defendant, CONSOLIDATED HIGH SCHOOL DISTRICT 230, the Plaintiff, RAUL REGALADO, sustained injuries of personal and pecuniary nature.

WHEREFORE, Plaintiff, RAUL REGALADO, demands judgment against the Defendant, CONSOLIDATED HIGH SCHOOL DISTRICT 230, for a sum in excess of FIFTY THOUSAND DOLLARS (\$50,000.00).

  
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Attorney for Plaintiff

Mr. Jeffrey J. Kroll  
CLIFFORD LAW OFFICES, P.C.  
120 North LaSalle Street  
31st Floor  
Chicago, Illinois 60602  
(312) 899-9090  
Atty. No.: 32640



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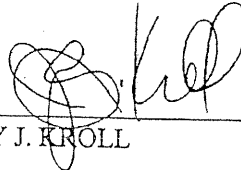
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COUNTY DEPARTMENT, LAW DIVISION

RAUL REGALADO,	)	
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Plaintiff,	)	
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F.H. PASCHEN, S.N. NIELSEN, INC.,	)	Plaintiff demands trial by jury.
JACOBS FACILITIES, INC.,	)	
VOA & ASSOCIATES, and CONSOLIDATED	)	
HIGH SCHOOL DISTRICT 230,	)	
	)	
Defendants.	)	

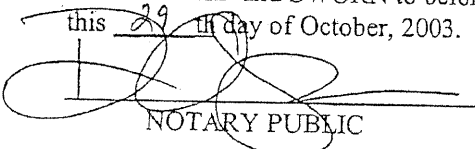
AFFIDAVIT REGARDING DAMAGES SOUGHT

NOW COMES the Plaintiff, RAUL REGALADO, by and through her attorney, JEFFREY J. KROLL, your affiant and being first duly sworn under oath, states as follows:

1. That your affiant is one of the attorneys of record for the party(ies) in this matter.
2. That the total money damages sought in this civil action exceeds an amount in excess of \$50,000.00.

  
JEFFREY J. KROLL

SUBSCRIBED and SWORN to before me  
this 29<sup>th</sup> day of October, 2003.

  
NOTARY PUBLIC

Clifford Law Offices, P.C.  
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Chicago, Illinois 60602  
(312) 899-9090  
Firm I.D. No. 32640

